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THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
DIVISION OF SAN FRANCISCO

TAMARA DOUKAS, an individual,) No. CV-02336-SI
Plaintiff,)
v.)
COUNTY OF SAN MATEO, a public)
entity, PENINSULA HUMANE)
SOCIETY, a private non-profit)
organization, DEBI DENARDI, an)
individual, KIM HADDAD, an individual,)
KKH INC., a private entity, SPIKE REAL)
STATE, a private entity, and DOES 1)
through 50, inclusive,)
Defendants.)
Complaint Filed: May 6, 2008

Counsel for HADDAD respectfully submits its Status Report in accordance with Judge Illston's Order to keep the court apprised of the status of the state court case after ordering the federal case stayed pending resolution of the state court case.

I. STATUS OF STATE COURT CASE

The state court case, San Mateo Superior Court Case No. No. CIV 461009, is continuing to proceed toward trial and the court has set a trial date of March 30, 2009.

Discovery Referee. The parties stipulated to the appointment of Judge Thomas Dandurand as discovery referee in this case to monitor depositions and rule on any objections to

1 form that occur therein and to generally maintain professionalism amongst the parties.

2 ***Depositions.*** The parties have proceeded with the depositions of plaintiff's treating
3 doctors and have set her mental exam for January 22, 2009. In addition her continued deposition
4 will be set prior to the discovery cutoff.

5 Plaintiff's counsel has now issued a subpoena to depose sitting San Mateo County
6 Superior Court Judge Miram as a witness in his client's case, based on the theory that he signed
7 the Reappointment of Officer Debbie Denardi to the Peninsula Humane Society.

8 The depositions of PHS employees Ken White (President of PHS) and Scott Delucchi
9 (PMK of the PHS) are also anticipated prior to the discovery cut-off.

10 Plaintiff has also noticed the deposition of Defendant Kim Haddad, DVM and owner of
11 the San Mateo Animal Hospital, is now set to go forward January 20, 2009. The depositions of
12 Dr. Walsh and Dr. Ulla, both veterinarian employees who participated in the care and treatment
13 of Kodiak prior to the euthanasia on August 2, 2006, are expected to go forward following the
14 deposition of Dr. Haddad.

15 ***Settlement Discussions.*** The parties have yet to engage in any serious settlement
16 discussions. We will provide a further status report on March 10, 2009 in accordance with the
17 court's order.

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19 Dated: January 30, 2009

BLEDSOE, CATHCART, DIESTEL,
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By 
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